

CHLOROBENZENES
TASK FOR

CER 080756

EPA/CERRO COPPER/EIL/PCB ATTORNEY WORK PRODUCT / ATTORNEY CLIENT PRIVILEGE

KRUMMRICH PLANT FUTURE ENVIRONMENTAL ISSUES

CHLOROBENZENES TASK FORCE
FEB. 24, 1989

AIR ISSUES

POSSIBLE ILLINOIS EPA STORAGE TANK EMISSION REGULATIONS

- * LIKELY APPLICABLE TO SOME PROCESS VESSELS
- * COMPLIANCE BY LATE 1991 (?)
- * INTERGRATE WITH TITLE III AIR REDUCTION PROGRAM

WATER ISSUES

YELLOW EFFLUENT

- * ONA/PNA AND NCBs
- * VARIANCE EXPIRES '9/89
- * EXPECT TO ADDRESS THROUGH
 - PRETREATMENT
 - CARBON ADDITION AT AMERICAN BOTTOMS
 - NEW EFFLUENT DIFFUSER

ACUTE TOXICITY

- * SAUGET LOCAL LIMITS WILL REQUIRE AMMONIA CONTROLS AT ONA/PNA INDEPENDENT OF PRETREATMENT
 - REQUIRED BY SECOND QUARTER 1992 BUT USEPA WILL DEMAND BY EARLY 1991
- * SHOULD BE REDUCED BY
 - PRETREATMENT
 - CARBON ADDITION AT AMERICAN BOTTOMS
 - NEW EFFLUENT DIFFUSER / MIXING ZONE

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CHRONIC TOXICITY - PERSISTENCE - BIO CONCENTRATION

* NOBES AND NITROANILINES MAY NEED ADDITIONAL TREATMENT
BEYOND PRETREATMENT

- DEPENDS ON MIXING ZONE
AND PERMIT LIMITS

* BETTER DEFINITION IN 2-4 MONTHS

- PERMIT DISCUSSIONS WILL BE IN PROGRESS

- MIXING ZONE RULES WILL BE BETTER
DEFINED

SPILL CONTROL

* ADDITIONAL REQUIREMENTS PER NEW ILLINOIS STORAGE TANK
RULES

- NEW TANK FARM SHOULD ADDRESS

SOLIDS

NO NEW CAPITAL ANTICIPATED

OPERATING COST COULD BE INFLUENCED BY TREATMENT PLANT SLUDGE
DISPOSAL COSTS

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